

Via ECF only

August 10, 2020

Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 1305
New York, New York 10007
EngelmayerNYSDChambers@nysd.uscourts.gov

Re: Roc Nation LLC v. HCC International Insurance Company, PLC
Venue: US District Court - Southern District of New York
Case No.: 1:19-cv-00554-PAE

Dear Judge Engelmayer:

This firm is legal counsel to Houston Casualty Company ("HCC"), improperly pled as HCC International Insurance Company, PLC, regarding the above-referenced matter. We write to request permission, pursuant to § 4.B of Your Honor's individual rules and practices, to file the following exhibits in support of HCC's Motion for Summary Judgment under seal:

1. Exhibit A, Profit & Loss Statement for 2016 and 2017, batestamped MDD_00332
2. Exhibit D, a bank statement batestamped RocNation_0000411 at 0000412
3. Exhibit E, portions of the deposition transcript of Gregory Resh, pages 157 – 160 (entire transcript having been marked confidential)
4. Exhibit F, Roc Nation Revenue Detail, batestamped RocNation_0000408
5. Exhibit H, portions of the deposition transcript of David Keoshgerian, page 75, line 24 – page 77, line 6, page 208, line 3 – page 210, line 3) (entire transcript having been marked confidential)
6. Exhibit I, portions of the deposition transcript of Hal Blackman, page 98, line 3 - page 103, line 19 (entire transcript having been marked confidential)
7. Exhibit J, portions of the deposition transcript of Phillip Hall, page 208 (entire transcript having been marked confidential)
8. Exhibit M, portions of the deposition transcript of David Keoshgerian, page 64 lines 21 – page 65, line 5 (entire transcript having been marked confidential)
9. Exhibit N, portions of the deposition transcript of Joseph Borrino, page 109, line 11 – page 110, line 7 (entire transcript having been marked confidential)
10. Exhibit O, portions of the deposition transcript of Hal Blackman, page 181, line 2 – page 182 line 17 (entire transcript having been marked confidential)

We also request permission to file of the following documents with narrowly tailored redactions:

1. Exhibit B, Expert Report of Glenn Silver, CPA
2. Exhibit C, HCC's Second Supplemental Response to Plaintiff's First Set of Interrogatories
3. Exhibit G, portions of the deposition transcript of Paul Gilbert, pages 65-68, Exhibits 10 & 11

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4. Exhibit K, email exchange batestamped Blackman_00002411
5. Exhibit L, email exchange batestamped BLACKMAN_00002371
6. HCC's Statement of Material Facts
7. HCC's Memorandum of Law in Support of Summary Judgment

In accordance with Your Honor's instructions, the documents have been uploaded via ECF with a limited viewing level restricting viewing to selected parties as we await Your Honor's review of these documents and decision.

Defendant seeks to file the aforementioned documents under seal or with limited redactions as they contain sensitive and confidential information pertaining to Plaintiff's business operations, financial information, and proprietary information as well as like information pertaining to individuals and entities that are not parties to this litigation. This information is not available within the public domain and was contemplated by the parties when they jointly drafted and entered into the confidentiality order entered by Your Honor on August 6, 2019. *See* Document No. 42.

Good cause exists for granting this request to file the above-referenced documents under seal so that it may include these documents in HCC's Motion for Summary Judgment.

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/George J. Vogrin
George J. Vogrin

Granted.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

August 12, 2020